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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF RENEE RECORDS IN  
SUPPORT OF REORGANIZED DEBTORS'  
EIGHTY-FOURTH OMNIBUS OBJECTION  
TO CLAIMS (THIRD-PARTY NO  
LIABILITY CLAIMS)**

**Response Deadline:  
June 16, 2021, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: June 30, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Renee Records, pursuant to section 1746 of title 28 of the United States Code, hereby declare  
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,  
3 and belief:

4 1. I am the Claims Manager at Pacific Gas and Electric Company (the “Utility” or “PG&E,”  
5 and, with PG&E Corporation, the “Debtors,” or, as reorganized pursuant to the Plan, the “Reorganized  
6 Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”). I submit this Declaration  
7 in support of the *Reorganized Debtors’ Eighty-Fourth Omnibus Objections to Claims (Third-Party No*  
8 *Liability Claims)* (the “Omnibus Objection”),<sup>1</sup> filed contemporaneously herewith.

9 2. As part of my job duties, I manage, administer, and monitor third-party claims,  
10 investigations, and incidents for final determination of property damage, bodily injury, and business  
11 interruption. I oversee department caseload to ensure integrity and regulatory compliance. I develop  
12 and present key analysis and reporting to enterprise officers, operations managers and clients regarding  
13 third-party incidents.

14 3. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
15 my personal knowledge, the knowledge of other PG&E personnel working under and alongside me on  
16 this matter, my discussions with the Reorganized Debtors’ various other advisors and counsel, and my  
17 review of relevant documents and information. If called upon to testify, I would testify competently to  
18 the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the  
19 Reorganized Debtors.

20 4. The Third-Party No Liability Claims are identified on Exhibit 1 to the Omnibus  
21 Objection, in the columns headed “Claims To Be Disallowed and Expunged.” Exhibit 1 also specifically  
22 identifies in the “Basis for Objection” that the Third-Party No Liability Claims are classified as one of  
23 the following:

24 a. Damage Not Caused by PG&E. These are Proofs of Claim where the Reorganized  
25 Debtors, after reviewing their books and records and any information submitted in connection with the  
26 Proofs of Claim, have determined that the harm or damage described in the Proof of Claim was not

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28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
the Omnibus Objection.

caused by the Debtors. Accordingly, the Reorganized Debtors have determined they are not liable for these amounts and the corresponding Proofs of Claim should be expunged.

b. Rule 15 Claims. These Proofs of Claim assert amounts arising from gas main extensions or installation projects. Pursuant to Pacific Gas and Electric Company Tariff Electric Rule 15 (“**Rule 15**”), any relocation or rearrangement of PG&E’s existing facilities, at the request of or to meet the convenience of an applicant or customer, and agreed upon by PG&E, normally shall be performed by PG&E at the Applicant’s expense. Accordingly, the Rule 15 Claims assert amounts for which the Debtors are not liable and the corresponding Proofs of Claim should be disallowed and expunged.

5. If not disallowed and expunged, the Third-Party No Liability Claims potentially could allow the applicable Claimants to receive recoveries to which they are not entitled.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed this twentieth day of May, 2021.

/s/ Renee Records  
Renee Records